

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

PETERSEN ENERGÍA INVERSORA, S.A.U.
and PETERSEN ENERGÍA, S.A.U.,

Plaintiffs,

-against-

ARGENTINE REPUBLIC and YPF S.A.,

Defendants.

No. 15-cv-02739-LAP

**DECLARATION IN SUPPORT OF
MOTION TO WITHDRAW AS
COUNSEL OF RECORD
PURSUANT TO LOCAL CIVIL
RULE 1.4**

I, Michael A. Paskin, declare as follows:

1. I am a partner of the law firm Cravath, Swaine & Moore LLP (“Cravath”), and I am admitted to practice before this Court.

2. I am familiar with the facts set forth below and submit this Declaration in Support of the Motion to Withdraw as Counsel of Record Pursuant to Local Civil Rule 1.4.

3. Defendant YPF S.A. (“YPF”) has requested that Cravath withdraw as counsel of record.

4. Rule 1.16(b)(3) of the New York Rules of Professional Conduct provides that withdrawal is appropriate where “the lawyer is discharged”.

5. Withdrawal by Cravath is therefore appropriate under Rule 1.16(b)(3) because YPF has requested that Cravath withdraw as counsel of record.

6. I understand that YPF has retained Debevoise & Plimpton LLP to represent it in this action.

7. Pursuant to the Stipulation and Scheduling Order endorsed on July 20, 2020, and the Court’s extension of fact discovery on November 12, 2020, this case is currently in discovery. Fact discovery will not be completed until February 16, 2021. The parties are conferring as to a new schedule for expert discovery. Trial is currently scheduled for June 2021.

8. There will be no prejudice to YPF by the withdrawal of Cravath because YPF has retained new counsel and there was a recent extension of the deadline for completion of fact and expert discovery.

9. Cravath is not asserting a retaining or charging lien in this matter.

10. Based on the foregoing, it is respectfully requested that Cravath be permitted to withdraw as counsel in this action.

11. I declare, under penalty of perjury, that the foregoing is true and correct.

Executed on this 9th day of December, 2020

/s/ Michael A. Paskin
Michael A. Paskin